

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

October 12 2022
By Ravi Subramanian, Clerk
SK Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

RAVEN MARLYNE HUDSON,
Defendant.

NO. **CR22-175 JLR**
INDICTMENT

The Grand Jury charges that:

COUNT 1

(Possession of Controlled Substances with Intent to Distribute)

On or about July 12, 2022, in King County, within the Western District of
Washington, RAVEN MARLYNE HUDSON did knowingly and intentionally possess,
with the intent to distribute, controlled substances, including: N-phenyl-N-[1-(2-
phenylethyl)-4-piperidinyl] propanamide (hereinafter "fentanyl"), methamphetamine,
heroin, and cocaine, substances controlled under Title 21, United States Code.

The grand jury further alleges that the offense involved 400 grams or more of a
mixture or substance containing a detectable amount of fentanyl; and 500 grams or more
of a mixture or substance containing a detectable amount of methamphetamine.

1 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),
2 and 841(b)(1)(C).

3 **COUNT 2**

4 **(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

5 On or about July 12, 2022, in King County, within the Western District of
6 Washington, RAVEN MARLYNE HUDSON knowingly possessed a firearm, that is, a
7 Glock Model 48 9x19 mm semiautomatic pistol with a loaded magazine, and a
8 Glock Model 19 9x19 mm semiautomatic pistol with a loaded extended capacity
9 magazine, in furtherance of a drug trafficking crime for which she may be prosecuted in a
10 court of the United States, that is, *Possession of Controlled Substances with Intent to*
11 *Distribute*, as alleged in Count 1 above.

12 All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

13 **COUNT 3**

14 **(Unlawful Possession of a Firearm)**

15 On or about July 12, 2022, in King County, within the Western District of
16 Washington, RAVEN MARLYNE HUDSON, knowing she had been convicted of the
17 following crimes punishable by a term of imprisonment exceeding one year:

- 18 i. *Murder in the Second Degree* and *Unlawful Possession of a Firearm*
19 *in the Second Degree*, in Kitsap County Superior Court, under case
20 number 05-1-01363-8, on or about March 3, 2006; and
21 ii. *Theft of a Firearm*, in Grays Harbor County Superior Court, under
22 case number 04-1-00099-1, on or about April 5, 2004;

23 did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that
24 is: a Glock Model 48 9x19 mm semiautomatic pistol with a loaded magazine, and a
25 Glock Model 19 9x19 mm semiautomatic pistol with a loaded extended capacity
26 magazine, both of which had been shipped and transported in interstate and foreign
27 commerce.

28 All in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The allegations contained in Counts 1 - 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1, RAVEN MARLYNE HUDSON shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to, the following property seized on or about July 13, 2022:

- a. \$9,635 in United States currency, seized on or about July 13, 2022;
- b. a Glock Model 48 9x19 mm semiautomatic pistol with a loaded magazine;
- c. a Glock Model 19 9x19 mm semiautomatic pistol with a loaded extended capacity magazine; and
- d. all associated ammunition.

Upon conviction of any of the offenses alleged in Counts 2 and 3, RAVEN MARLYNE HUDSON shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and ammunition that were involved in the offenses. This property includes, but is not limited to, the following property seized on or about July 13, 2022:

- a. a Glock Model 48 9x19 mm semiautomatic pistol with a loaded magazine;
- b. a Glock Model 19 9x19 mm semiautomatic pistol with a loaded extended capacity magazine; and
- c. all associated ammunition.

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
2 any act or omission of the defendants,

- 3 a. cannot be located upon the exercise of due diligence;
4 b. has been transferred or sold to, or deposited with a third party;
5 c. has been placed beyond the jurisdiction of the Court;
6 d. has been substantially diminished in value; or,
7 e. has been commingled with other property which cannot be divided
8 without difficulty;

9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to
11 Title 21, United States Code, Section 853(p).

12
13 A TRUE BILL:

14 DATED: 10/12/2022

15
16 *Signature of Foreperson redacted pursuant*
17 *to the policy of the Judicial Conference of*
18 *the United States.*

19
20 _____
21 FOREPERSON

22
23 _____
24 NICHOLAS W. BROWN
25 United States Attorney

26
27 _____
28 TODD GREENBERG
 Assistant United States Attorney